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January 11, 2021

Via ECF Only

Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

**Re: United States v. Edward Shin
Case No.: 1:19-cr-00552-GHW**

Dear Judge Woods:

I represent Edward Shin in the above-referenced matter. I am writing in response to Your Honor's recent Order concerning proposing a trial date for late summer/early fall. On behalf of Mr. Shin, I am respectfully requesting a trial date of October 25, 2021 with a possible fall back date of October 18, 2021. We have had several telephone conversations and email exchanges with the Government, but have not been able to reach an agreement on a trial date. I understand that the Government will be submitting its own letter with its own proposal.

As set forth in my prior letter dated December 2, 2020, to Your Honor, my co-counsel Robert Basil will be turning 70 in June and is the sole caretaker for his 74-year-old wife, I am 64-years-old with a prior health condition and my client is 57-years-old with high blood pressure and diabetes. We are proposing the October dates mindful that the COVID-19 pandemic remains surging and the prospect for accomplishment of herd immunity remains unclear at this time. We also believe that setting the October date at this time will allow the parties to lock in now to a realistic date and avoid entanglements with other trial commitments.

In addition, we have retained a jury consultant who advises us that she is not available in September through mid-October due to prior commitments on two capital cases that have likewise been delayed.

I believe that the Government will be requesting a July date. We do not think that date is good because as the Court is aware it will require preparations in June involving witnesses and numerous interpersonal contacts. In addition, we are not at all confident that COVID-19 will be under control by June or July.

In addition, in an abundance of candor, I am requesting that the Court not consider August as I have a longstanding commitment with my wife to travel to England during the period of August 10 through August 22 to visit our son who lives in London. This trip involves a transatlantic crossing in one direction. While we cannot know at this time whether this trip will even occur due to COVID-19, it is likely that the conditions that could cause its cancellation would also in all likelihood prevent the trial from proceeding in August.

For all of these reasons, we respectfully request that the Court set October 25, 2021 as the trial date with a fall back date of October 18, 2021.

Respectfully submitted,

/s/ Paul B. Brickfield

Paul B. Brickfield

cc: Robert Basil, Esq. (via ECF only)
Assistant U.S. Attorney Tara LaMorte (via ECF only)
Assistant U.S. Attorney Anden Chow (via ECF only)
Assistant U.S. Attorney Sarah Mortazavi (via ECF only)